

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: 87717

School Food Authority: St. Mary's Parochial School

School(s) Reviewed: Hilbert Middle School

Review Date(s): 1-19-17

Date of Exit Conference: 1-19-17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Please submit corrective action via email, fax or mail prior to the negotiated due date to the attention of Debra Wollin with the exception of findings pertaining to section 2. Kathy Clark is responsible for following up on this portion of the review. Contact information is provided below:

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Mary Parochial School for the courtesies extended to me during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review and I greatly appreciated the work done prior to the review in completing the Off-site Assessment Tool. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

Review Areas

1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Appreciation/Commendations/Noteworthy Initiatives:

Of those students eligible for free/reduced price meals in December, all were determined correctly, direct certification had been run in the appropriate timeframes, and Verification was completed by November 15. Kudos for a job well done!

Comments/Technical Assistance/Compliance Reminders:

Verification

- The LEA must complete the verification process no later than November 15 of each school year, but the Verification Collection Report is not due to be submitted until February 1.

2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Commendations

Thank you to the staff at St. Mary's Parochial School for their dedication to providing students with healthy meals. Your efforts make a difference!

Comments/Technical Assistance/Compliance Reminders:

- Many resources exist to help schools learn more about meal pattern requirements. Short training webcasts are available at <http://dpi.wi.gov/school-nutrition/training/webcasts> that provide information on each meal pattern component and on additional topics such as product formulation statements and Offer versus Serve (OVS). General meal pattern resources are posted on the website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. Additional information about each component can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>. Make sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What's New with School Nutrition* webinar. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.
- Current nutrition fact labels, Child Nutrition (CN) labels, and/or manufacturers' product formulation statements clearly outlining dietary specifications and crediting information should be available onsite where the meals are served, even if meals are prepared offsite. Product information should be updated at least once annually and at any time a new product is introduced. Work with your vendor to ensure documentation is received. Your school is ultimately responsible for reviewing the documentation to verify that the vendor is providing compliant meals. Purchasing a scale for the kitchen would assist in the process of determining whether or not meals are compliant.
- It was recommended that your vendor use a different transport sheet template, available at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/transport-sheet.doc>. This template provides recording space for all required information. The vendor would be responsible for completing the columns below "Production Kitchen" while your school would be responsible for completing the information below "Serving Site." This template can be modified if needed. Make sure to record leftovers every day for every food item offered as part of the reimbursable meal.
- As meat/meat alternates are measured by weight not volume when contributing to the meal pattern, it is recommended that your school purchase a small measure scale to check weights for portioning.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Milk varieties offered and daily milk usage by variety is not currently being recorded. This is a requirement and there is recording space available on the transport sheet template mentioned in the technical assistance section above.
Corrective Action Needed: Submit one week of completed transport sheets that shows what milk varieties were offered to students each day and what the usage was. Remember that the completed transport sheets should show leftovers for all food items offered with the meal as well.
- ❑ **Finding #2:** The weekly veggie buffet production record submitted for the December review week did not contain all required information. The vegetables that are offered daily need to have a planned portion size. The vendor has sent a Garden Bar Production Record, available at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/garden-bar-production-record.doc> that is recommended. This template has columns to record all necessary information.
Corrective Action Needed: Submit one week of completed Garden Bar Production Records (or equivalent) that clearly shows what vegetables were offered each day, what the planned portion sizes were, and what the usage was.
- ❑ **Finding #3:** The staff responsible for determining a reimbursable meal were unclear on Offer vs Serve, and lunch meal pattern quantities.
Corrective Action Needed: Have all staff responsible for determining reimbursable meals attend a training on Offer vs Serve. The lunch meal pattern <http://dpi.wi.gov/school-nutrition/training/webcasts#lunch> and offer vs serve <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs> webcasts may be used. Please submit the attendance sign-in roster when complete.

3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs

Comments/Technical Assistance/Compliance Reminders:

Annual Food Service Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- Categories of the AFR that should be addressed when tracking revenues and expenditures:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Nonprogram Foods”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>

- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues. .

Allowable Expenditures

- The nonprofit school food service account is to be used only for the operation of the school meal program including food, supplies, equipment and personnel. .
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- **Bad debt** is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs.

Unpaid Meal Charges Policy

- All School Food Authorities (SFA) operating federal school meal programs must have a written and clearly communicated policy to address unpaid meal charges in place by July 1, 2017.
- SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- The policy must explain how the SFA will handle situations where children eligible to receive reduced price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service.
- The policy should be implemented and enforced SFA-wide.
- The SFA has discretion to vary policy based on student grade level.

Findings and Corrective Action Needed:

- ☐ **Finding #1:** Your 15-16 Annual Financial Report had nothing reported in A La Carte, with all revenues and expenses reported in National School Lunch. Because your school sells extra milk and adult meals, they need to be reported as a la carte or nonprogram foods.
Corrective Action Needed: Please provide a statement of understanding that for the current 16-17 school year, all nonprogram foods expenses and revenues will be broken out from National School Lunch.

4. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current long statement However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.

Local Wellness Policy and School Meal Environment

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of

2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 and full compliance with requirements of the final rule by June 30, 2017.

- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.
- **Content of the Wellness Policy** - At a minimum the wellness policy must include:
 - Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
 - Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
 - Standards for all foods and beverages provided, but not sold, to students during the school day.
 - Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
 - Description of public involvement, public updates, policy leadership, and evaluation plan.
- SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.
- A summary of the requirements can be found at: https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- At this time, there are no foods outside of the reimbursable meal being sold to students for consumption during the school day. If this changes, make sure to review any foods or beverages sold to students during the school day for compliance with Smart Snacks regulations. Refer to the Smart Snacks “In a Nutshell” handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf> for more information. Additional information can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/snt_mail_120214.docx.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- One person in the SFA must be designated as the Food Service Director and meet the yearly director training requirement of 12 hours.

- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
		(20 hrs or more/week)	(less than 20 hrs/week)
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Food Safety and Storage

- Most recent food safety inspection must be posted in public view.
- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

Findings and Corrective Action Needed:

- ☐ **Finding #1:** The menu has the incorrect nondiscrimination statement printed on it.
Corrective Action Needed: Please change the nondiscrimination statement to **“This institution is an equal opportunity provider”**, and submit a copy of the February menu.

- ☐ **Finding #2:** The most recent Health inspection was not posted out in the cafeteria in public view.
Corrective Action Needed: Please move health inspection report outside the door of the kitchen so it is visible to all. This was completed while on-site so no further action required.
- ☐ **Finding #3:** The food safety plan has both “the site sells compartmentalized meal,” which means pre-plated meals, and “no onsite food preparation and milk is stored at site” recorded in its food safety plan. The school operates as a satellite with no onsite food preparation and milk is stored at site.
Corrective Action Required: Please amend your food safety plan to reflect this service type.
- ☐ **Finding #4:** The fresh cucumbers and tomatoes came from Mexico and not USA.
Corrective Action Required: Please submit a statement of understanding that all procurement documentation must include the “Buy American” language in the contract.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. Part 210.08 of federal regulations requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency’s publicly available website, and the SFA is strongly encouraged to post a summary on the SFA’s public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.